

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

True Value Manufacturing
Attn: Marcella Nichols
201 Jandus Road
Cary, Illinois 60013

Application No.: 95020117
Applicant's Designation: BLACKHAWK
Subject: Paint Manufacturing
Date Issued: July 12, 2004
Location: 823 West Blackhawk, Chicago

I.D. No.: 031600FVA
Date Received: May 28, 2004
Expiration Date: February 1, 2006

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two (2) boilers (mmBtu/hr and 6.3 mmBtu/hr), two (2) furnaces (3mmBtu/hr, each), paint manufacturing operation, 14 bulk material storage tanks, paint mixing vessels with dust collection, and various mixer, holding tanks, an immersion mill, dispersers, and thinning operations pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material to less than 25 tons/yr, combined hazardous air pollutants (HAPs) to less than 25 tons/yr, and single hazardous air pollutant (HAP) to less than 10 tons/yr). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

- 3a. Emissions and operation of paint manufacturing process, including all clean-up operations, shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Brush-On Paint Manufacturing	350,000	3,500,000	3,465	17.33
Aerosol Concentrates Manufacturing	70,000	700,000	662	3.31

These limits are based on the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on no increase in raw material usage and emissions from replacing all sand mills with an immersion mill for brush-on paint manufacturing.
4. Emissions and operation of natural gas-fired units shall not exceed the following limits:

<u>Process</u>	<u>Amount Consumed</u>		<u>Pollutants</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>		<u>Factors</u> <u>(Lb/mmscf)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Natural Gas Combustion	12	134	NO _x	100	1,200	6.7
			CO	84	1,008	5.63
			TSP	7.6	91	0.51
			VOM	5.5	66	0.37

These limits are based on standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. Emissions and operation of pigment usage in paint manufacturing shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Emission</u> <u>Factor</u> <u>(Lb/Ton)</u>	<u>TSP Emissions</u>	
	<u>(Ton/Hr)</u>	<u>(Ton/Yr)</u>		<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
Pigment Additive with Dust Collection	20	170,000	20	12	51

These limits are based on standard AP-42 emission factors, control efficiency of 97% and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. Emissions of VOM from all storage tanks shall not exceed 1.25 tons/year.
7. Emissions of VOM from fugitive losses during material transfer shall not exceed 0.45 tons/year.

- 8a. The 14 bulk storage tanks storage tank(s) are subject to New Source Performance Standards (NSPS), 40 CFR 60 Subpart Kb. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
 - b. At all times, the Permittee shall, to the extent practicable, maintain and operate these tanks, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.
 - c. The Permittee shall fulfill the monitoring of operations requirements of the New Source Performance Standards, 40 CFR 60.116b(a) and (b) for the 14 bulk storage tanks. That is, records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel, shall be maintained and readily accessible for the life of the source.
9. Pursuant to 35 Ill. Adm. Code 218.624, No person shall operate an open-top mill, tank, vat or vessel with a volume of more than 45 l (12 gal) for the production of paint or ink unless:
- a. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in) beyond the outer rim of the opening or be attached to the rim.
 - b. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.
 - c. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.
10. Pursuant to 35 Ill. Adm. Code 218.625:
- a. No person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.
 - b. No person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.
 - c. The manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours.

11. Pursuant to 35 Ill. Adm. Code 218.626:

- a. The owner or operator shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum conservation vents set as a minimum at ± 0.2 kPa (0.029 psi). These controls shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- b. Stationary VOL storage containers with a capacity greater than 946 l (250 gal) shall be equipped with a submerged-fill pipe or bottom fill. These controls shall be operated at all times. An alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.

12. Pursuant to 35 Ill. Adm. Code 218.628, The owner or operator of a paint or ink manufacturing source shall, for the purpose of detecting leaks, conduct an equipment monitoring program as set forth below:

- a. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
- b. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
- c. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.
- d. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.

13. Pursuant to 35 Ill. Adm. Code 218.630:

- a. No person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.

- b. No person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.
14. Pursuant to 35 Ill. Adm. Code 218.637:
- a. Upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of this Subpart shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from this Subpart. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.
 - b. Every owner or operator of a source which is subject to the requirements of this Subpart shall maintain all records necessary to demonstrate compliance with those requirements at the source for three years.
15. The Permittee shall maintain monthly and annual records of the following:
- a. Name, usage (lb/mo and lb/yr), VOM and HAP content (lb/gal or % wt.), and VOM and HAP emission calculations based on Raolt's Law using vapor pressures, molecular weights, temperature, etc. (lb/mo and ton/yr) of the following:
 - i. Pigment and solvents used in the manufacturing of brush-on paint;
 - ii. Pigment and solvents used in the manufacturing of aerosol concentrates;
 - iii. Solvents stored in each of the storage tanks; and
 - iv. All clean-up solvents.
 - b. Natural gas usage (mmscf/mo and mmscf/yr)
 - c. Vapor pressure of solvents in each of the storage tanks.
 - d. Type and amount of paint manufactured.
16. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

17. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
18. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

19. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. The records required by Condition 15(d).

Please note that the sand mills for brush-on paint manufacturing have been replaced with an immersion mill from Construction Permit 04050084.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from paint manufacturing operation operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 3,500,000 gallons of brush-on paint and 700,000 gallons of aerosol concentrates paint. The resulting maximum emissions are well below the levels, e.g., less than 25 tons/year of volatile organic material (VOM) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>VOM</u> <u>(Ton/Yr)</u>	<u>TSP</u> <u>(Ton/Yr)</u>	<u>NO_x</u> <u>(Ton/Yr)</u>	<u>CO</u> <u>(Ton/Yr)</u>	<u>Single HAPs</u> <u>(Ton/Yr)</u>	<u>Combined HAPs</u> <u>(Ton/Yr)</u>
22.8	51.5	6.7	5.63	< 10	< 25

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